

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

UNITED STATES)	
)	
V.)	No. 1:21-cr-00036-2
)	
)	
Caitlin Fillion)	

DEFENDANT’S MOTION FOR EARLY TERMINATION OF PROBATION

The Defendant, Caitlin Fillion, through undersigned counsel respectfully requests that this Honorable Court terminate her supervised release early, pursuant to 18 USC, Section 3583(e)(1).

In support of this Motion the following is stated:

On September 14, 2021, Ms. Fillion pled guilty to count two of an indictment charging her with possession of a firearm by a prohibited person, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). Ms. Fillion entered the LASER Docket Program on April 13, 2022 and successfully completed it on May 10, 2023, after exception performance. On July 26, 2023, Ms. Fillion was sentenced to time served followed by two (2) years of supervised release and a \$100 special assessment.

U.S.C. Title 18 section 3583(e)(1) authorizes the Court to terminate the term of supervised release at any time after the expiration of one (1) year of supervision provided the defendant’s conduct warrants such action and that granting such relief would be in the interest of Justice. Section 3583(e) states that a Court may grant such relief after considering the sentencing

factors set forth in 18 U.S.C. section 3553(a)(1), (a)(2)(B), (a)(2)(C), (a)(2)(D), (a)(4), (a)(5), (a)(6), and (a)(7).

After successful completion of the LASER Docket Program, Ms. Fillion has continued to live a law abiding, sober, employed and responsible life. She has maintained her employment at the SOS Recover where she works as a Peer Strength Supervisor. She has been employed at SOS since November of 2022. She provides peer support to participants in the Rockingham, Strafford, Carroll, and Coos Recovery Courts. She spends Wednesdays at Strafford County Probation and Parole where she provides additional support. She also maintains her part-time employment at U-Haul.

Ms. Fillion continues to work on self-improvement. She continues to work toward her Bachelor of Arts degree in Human Services at Southern New Hampshire University and was awarded high honors. She has a graduation date in June of 2025. attends church at Journey Church in Barrington, New Hampshire, on Thursdays.

Ms. Fillion was married in November 2023, and moved to Lee, New Hampshire, with her husband. She continues to be active in her youngest son's life and shares guardianship with his father. He attended camp at the YMCA over this past summer and has lived with Ms. Fillion full-time since then. She has also spent more time with her 16-year-old, attending all of his football games this summer in Worcester, Massachusetts.

Ms. Fillion has abided by the conditions of her release and has had no negative police contacts since the completion of LASER.

The goals of sentencing have been met in this case as Ms. Fillion has become a productive member of society and has made significant rehabilitative efforts.

The Government, through Assistant United States Attorney Heather Cherniske, assents to

the relief sought in this Motion.

Probation, through Officer William Carroll, assents to the relief sought in this Motion.

WHEREFORE, the defendant, through undersigned counsel, respectfully moves this Honorable Court to grant this Motion and terminate her supervision early, and for such other just and equitable relief the Court deems necessary.

Respectfully submitted,
Caitlin Fillion
By Her Attorney,

Date: September 3, 2024

/s/ Jonathan Cohen
Jonathan Cohen
NH Bar # 14185
Cohen & Winters, PLLC
64 North State Street, Suite 1
Concord, NH 03301
(603) 224-6999

CERTIFICATE OF SERVICE

I Jonathan Cohen, herein certify that on this 3d day of September, 2024, a copy of the within was electronically forwarded to Assistant United States Attorney Heather Cherniske.

/s/ Jonathan Cohen
Jonathan Cohen